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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON – PORTLAND DIVISION

**CALISTA ENTERPRISES LTD.,**  
a Republic of Seychelles company,

Plaintiff,

- v. -

**TENZA TRADING LTD.,**  
a Cyprus company,

Defendant.

Case No. 3:13-cv-01045-SI

**DECLARATION OF LAUREN WHITNEY  
IN SUPPORT OF CALISTA'S REPLY IN  
SUPPORT OF ITS MOTION FOR  
SUMMARY JUDGMENT**

**TENZA TRADING LTD.,**  
a Cyprus company,

Counterclaim Plaintiff,

- v. -

**CALISTA ENTERPRISES LTD.,**  
a Republic of Seychelles company, and  
**ALEXANDER ZHUKOV,**  
a Czechoslovakian citizen,

Counterclaim Defendants.

I, Lauren Whitney, declare as follows:

1. I am an employee of Boston Law Group, PC, counsel of record to Calista Enterprises Ltd. in the above captioned action. I have personal knowledge of the facts stated herein. If called upon to do so, I could and would testify to the truth thereof.
2. I have reviewed the list of domain names that comprise Exhibit 1 to the Declaration of Evan Fray-Witzer in Support of Calista Enterprises Ltd.'s Motion for Summary Judgment (Docket No. 97). As evidenced below, I took a sampling of 50 of the domain names in that list of domain names by checking the website and WHOIS record for each domain name in the top right and bottom left of each page of the list to determine whether those domain names were actually ever registered and if they were in use.
3. As evidenced below, it appears that every single domain name that I sampled was at some point registered. Out of 50 of them, only two of the domain name registrations were currently expired (those domain names being fickporntube.com and porntubewife.com).

4. Many of the screen captures of the websites at the sampled domain names attached hereto have been partially redacted so as to remove sexually explicit images.

5. Attached hereto as Exhibit 1 is a true screen capture of the website 21porntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain 21porntube.com that I accessed on July 17, 2014.

6. Attached hereto as Exhibit 2 is a true screen capture of the website 8porntubes.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain 8porntubes.com that I accessed on July 17, 2014.

7. Attached hereto as Exhibit 3 is a true screen capture of the website anal-porntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain anal-porntube.com that I accessed on July 17, 2014.

8. Attached hereto as Exhibit 4 is a true screen capture of the website arabporntube4free.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain arabporntube4free.com that I accessed on July 17, 2014.

9. Attached hereto as Exhibit 5 is a true screen capture of the website beautyporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain beautyporntube.com that I accessed on July 17, 2014.

10. Attached hereto as Exhibit 6 is a true screen capture of the website that resolved when I accessed bigbootyporntube.com on July 17, 2014 and a true printout of the WHOIS results for the domain bigbootyporntube.com that I accessed on July 17, 2014.

11. Attached hereto as Exhibit 7 is a true screen capture of the website boysporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain boysporntube.com that I accessed on July 17, 2014.

12. Attached hereto as Exhibit 8 is a true screen capture of the website cashporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain cashporntube.com that I accessed on July 17, 2014.

13. Attached hereto as Exhibit 9 is a true screen capture of the website dailyfreeporntubes.net that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain dailyfreeporntubes.net that I accessed on July 17, 2014.

14. Attached hereto as Exhibit 10 is a true screen capture of the website docporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain docporntube.com that I accessed on July 17, 2014.

15. Extremeporntube.net did not resolve to a website when I attempted to access it on July 17, 2014. Attached hereto as Exhibit 11 is a true printout of the WHOIS results for the domain extremeporntube.net that I accessed on July 17, 2014.

16. Fickporntube.com did not resolve to a website when I attempted to access it on July 17, 2014. Attached hereto as Exhibit 12 is a true printout of the WHOIS results for the domain fickporntube.com that I accessed on

17. Attached hereto as Exhibit 13 is a true screen capture of the website freehdporntubes.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain freehdporntubes.com that I accessed on July 17, 2014.

18. Attached hereto as Exhibit 14 is a true screen capture of the website freeporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain freeporntube.com that I accessed on July 17, 2014.

19. Freexxxxporntube.com did not resolve to a website when I attempted to access it on July 17, 2014. Attached hereto as Exhibit 15 is a true printout of the WHOIS results for the domain freexxxxporntube.com that I accessed on July 17, 2014.

20. Attached hereto as Exhibit 16 is a true screen capture of the website gaybearporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain gaybearporntube.com that I accessed on July 17, 2014.

21. Attached hereto as Exhibit 17 is a true screen capture of the website that resolved when I accessed goldenageofporntube.com on July 17, 2014, and a true printout of the WHOIS results for the domain goldenageofporntube.com that I accessed on July 17, 2014.

22. Attached hereto as Exhibit 18 is a true screen capture of the website growporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain growporntube.com that I accessed on July 17, 2014.

23. Attached hereto as Exhibit 19 is a true screen capture of the website hindiporntube.org that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain hindiporntube.org that I accessed on July 17, 2014.

24. Attached hereto as Exhibit 20 is a true screen capture of the website hotsexyporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain hotsexyporntube.com that I accessed on July 17, 2014.

25. Attached hereto as Exhibit 21 is a true screen capture of the website iphoneporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain iphoneporntube.com that I accessed on July 17, 2014.

26. Attached hereto as Exhibit 22 is a true screen capture of the website jokerporntube.net that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain jokerporntube.net that I accessed on July 17, 2014.

27. Attached hereto as Exhibit 23 is a true screen capture of the website lastporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain lastporntube.com that I accessed on July 17, 2014.

28. Attached hereto as Exhibit 24 is a true screen capture of the website lineporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain lineporntube.com that I accessed on July 17, 2014.

29. Attached hereto as Exhibit 25 is a true screen capture of the website maturewomanporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain maturewomanporntube.com that I accessed on July 17, 2014.

30. Attached hereto as Exhibit 26 is a true screen capture of the website mobilehdporn tube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain mobilehdporn tube.com that I accessed on July 17, 2014.

31. Attached hereto as Exhibit 27 is a true screen capture of the website naijaporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain naijaporntube.com that I accessed on July 17, 2014.

32. Attached hereto as Exhibit 28 is a true screen capture of the website notaporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain notaporntube.com that I accessed on July 17, 2014.

33. Attached hereto as Exhibit 29 is a true screen capture of the website perfectporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain perfectporntube.com that I accessed on July 17, 2014.

34. Attached hereto as Exhibit 30 is a true screen capture of the website pornporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain pornporntube.com that I accessed on July 17, 2014.

35. Porntube6.com did not resolve to a website when I attempted to access it on July 17, 2014. Attached hereto as Exhibit 31 is a true printout of the WHOIS results for the domain porntube6.com that I accessed on July 17, 2014.

36. Attached hereto as Exhibit 32 is a true screen capture of the website porntubebank.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain porntubebank.com that I accessed on July 17, 2014.

37. Attached hereto as Exhibit 33 is a true screen capture of the website porntubedir.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain porntubedir.com that I accessed on July 17, 2014.

38. Attached hereto as Exhibit 34 is a true screen capture of the website porntubefind.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain porntubefind.com that I accessed on July 17, 2014.

39. Attached hereto as Exhibit 35 is a true screen capture of the website porntubejapan.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain porntubejapan.com that I accessed on July 17, 2014.

40. Attached hereto as Exhibit 36 is a true screen capture of the website porntubemania.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain porntubemania.com that I accessed on July 17, 2014.

41. Attached hereto as Exhibit 37 is a true screen capture of the website porntubeprime.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain porntubeprime.com that I accessed on July 17, 2014.

42. Attached hereto as Exhibit 38 is a true screen capture of the website porntubese.net that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain porntubebank.net that I accessed on July 17, 2014.

43. Attached hereto as Exhibit 39 is a true screen capture of the website porntubetroie.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain porntubetroie.com that I accessed on July 17, 2014.

44. Porntubewife.com did not resolve to a website when I accessed it on July 17, 2014. Attached hereto as Exhibit 40 is a true printout of the WHOIS results for the domain porntubewife.com that I accessed on July 20, 2014.

45. Attached hereto as Exhibit 41 is a true screen capture of the website rapidporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain rapidporntube.com that I accessed on July 17, 2014.

46. Attached hereto as Exhibit 42 is a true screen capture of the website rollporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain rollporntube.com that I accessed on July 17, 2014.



47. Attached hereto as Exhibit 43 is a true screen capture of the website shemale-porntubes.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain shemale-porntubes.com that I accessed on July 17, 2014.

48. Attached hereto as Exhibit 44 is a true screen capture of the website sleepsexporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain sleepsexporntube.com that I accessed on July 17, 2014.

49. Attached hereto as Exhibit 45 is a true screen capture of the website teenageporntube.net that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain teenageporntube.net that I accessed on July 17, 2014.

50. Attached hereto as Exhibit 46 is a true screen capture of the website thatporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain thatporntube.com that I accessed on July 17, 2014.

51. Attached hereto as Exhibit 47 is a true screen capture of the website twinkporntube.net that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain twinkporntube.net that I accessed on July 17, 2014.

52. Attached hereto as Exhibit 48 is a true screen capture of the website vintage-porntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS results for the domain vintage-porntube.com that I accessed on July 17, 2014.

53. Attached hereto as Exhibit 49 is a true screen capture of the website wwporntube.com that I accessed on July 17, 2014 and a true printout of the WHOIS search results for the domain wwporntube.com that I accessed on July 18, 2014.

54. Attached hereto as Exhibit 50 is a true screen capture of the website that resolved when I accessed xporntubes.com on July 17, 2014, and a true printout of the WHOIS results for the domain xporntubes.com that I accessed on July 17, 2014.

I swear under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct.

Dated: July 22, 2014

/s/ Lauren Whitney  
Lauren Whitney